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HOPE FOR CHILDREN, INC.

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U.S. Department of State, CA/OCS/PRI  
Adoption Regulations Docket Room  
SA-29  
2201 C Street, N.W., Washington, DC 20520

Comments in reference to docket number State/AR-01/96

As a Licensed Master in Social Work, currently working in the field of adoption, I would like to offer the following suggestions regarding the proposed regulations:

1. Decrease the \$1,000,000 minimum limit requirement on adoption agency liability insurance for any organization classified as "non-profit". This is incredibly expensive insurance and is becoming more difficult to purchase. As a non-profit agency, insurance is a priority for us, but so is helping families adopt children. To continue our services, we request lowering the minimum limit in accordance with the number of adoptions completed each year. To project insurance for the upcoming year, the organization's budget could be a more accurate way to approximate insurance expenses.
2. Allow state licensing organizations more time to become accrediting entities for the Hague regulations. Having only one or two licensing organizations does not provide sufficient time to thoroughly review each agency providing adoption services to ensure they are in accordance with the Hague regulations. In addition, the fees are more expensive if the competition for accrediting agencies is divided between only a few agencies providing these services.
3. Allow Home Study Caseworkers to have either a Bachelors degree, or a minimum of two years of documented training and experience in the field. Requiring a Master's Degree for these caseworkers is unrealistic due to the high demand for Masters Level caseworkers in other areas of the field that would pay more than a Home Study caseworker. As an LMSW, I personally would not accept a Home Study caseworker position due to the decreased amount of pay in comparison with other Masters Level Positions.
4. In my opinion, these regulations need more time and careful consideration, specifically in the area of separating non-profit from for profit organizations and educational requirements. I recommend and strongly suggest that these regulations be rewritten and republished before they become law.

Sincerely and Honestly,

Kimberly Eden, LMSW  
Hope for Children, Inc.  
Domestic Social Worker

INTERNATIONAL AND DOMESTIC ADOPTIONS

A COMMITMENT TO THE HOPE OF CHILDREN

Member:  
Joint Council on International Children's Services  
Georgia Assoc. of Licensed Adoption Agencies